

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] RUBEN REYES-ECHEVARRIA,
(Counts 1 and 3),
[2] CARLOS RUBERT- COLLAZO,
(Count 1 and 3),
[3] JOSE A. RIVERA-SEGARRA,
a.k.a. "Hershey",
(Count 1 and 2),
[4] ROBERTO BAEZ-SEGARRA,
a.k.a "Blackie"
(Count 1 and),
Defendants.

INDICTMENT

CRIMINAL NO. 99- 69(PM)

VIOLATIONS:

18 USC §§ 2 & 924(c)(1)
21 USC §§ 841(a)(1) & 846

(THREE COUNTS)

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U.S. DISTRICT COURT
SANTO DOMINGO, P.R.

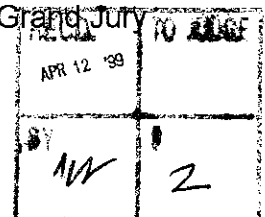
THE GRAND JURY CHARGES:

COUNT ONE

On or about 1995, the exact date to the Grand Jury unknown, and up to on or about March 18, 1999, in Juana Díaz, Salinas, Coamo, Santa Isabel, and Ponce in the District of Puerto Rico and elsewhere, and within the jurisdiction of this Court, the defendants herein and others known and unknown to the Grand Jury including but not limited to:

[1] RUBEN REYES-ECHEVARRIA,
[2] CARLOS RUBERT-COLLAZO
[3] JOSE A. RIVERA-SEGARRA
a.k.a. "Hershey", and,
[4] ROBERTO BAEZ-SEGARRA,
a.k.a "Blackie"

the defendants herein, did knowingly, willfully, unlawfully, and intentionally, combine, conspire, confederate and agree together with each other and with divers other persons to the Grand Jury



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known and unknown, to commit offenses against the United States, to wit: to knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II, Narcotic Drug Controlled Substance which amounts exceeded five (5) kilograms of cocaine, and heroin, a Schedule I, Narcotic Drug Controlled Substance, which amounts exceeded one kilogram (1) of heroin, that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1).

I. OBJECTS OF THE CONSPIRACY

The objects of said conspiracy were, among others:

1. The purchase of controlled substances for further distribution in the South Coast of Puerto Rico.
2. To distribute controlled substances, including cocaine and heroin, at various drug points (known as "puntos") located at the Brisas del Mar Housing Project in the municipality of Salinas, El Cemi Housing Project located in the municipality of Santa Isabel, the Pastillo Ward in the municipality of Juana Diaz and a housing project known as "Vietnam" in the municipality of Coamo, Puerto Rico, for financial gain and profit.
3. To possess and carry firearms in order to protect their persons and the drug points ("puntos") against other drug trafficking organizations or law enforcement personnel.

II. MEANS AND MANNER OF THE CONSPIRACY

During pertinent times of the conspiracy, **[1] RUBEN REYES-ECHEVARRIA**, was the owner of the drug points located at Brisas del Mar Housing Project in the municipality of Salinas, El Cemi Housing Project located in the municipality of Santa Isabel, the Pastillo Ward in the municipality of Juana Diaz and a housing project known as "Vietnam" in the municipality of

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Coamo, Puerto Rico. **[1] RUBEN REYES-ECHEVARRIA** was assisted in the administration of his drug trafficking business by **[2] CARLOS RUBERT-COLLAZO** who among other things was in charge of the distribution of the narcotics and the collection of the drug proceeds.

III. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of this conspiracy and to effect and accomplish the objects of the conspiracy, the co-conspirators committed, among others, the following overt acts, in Juana Díaz, Salinas, Coamo, and Santa Isabel in the District of Puerto Rico and elsewhere, within the jurisdiction of this Court:

1. During pertinent times of the conspiracy **[1] RUBEN REYES-ECHEVARRIA** was a drug associate of Jose Alberto Martinez-Torres, a.k.a "Bertin Martinez", deceased. They would distribute narcotics (cocaine and heroin) in the Southern Coast of Puerto Rico.

2. During pertinent times of this conspiracy, **[2] CARLOS RUBERT COLLAZO**, acted as the right hand man of **[1] RUBEN REYES-ECHEVARRIA** in the administration of his various drug points.

3. During pertinent times of this conspiracy, **[2] CARLOS RUBERT-COLLAZO** delivered and purchased narcotics from an un-indicted co-conspirator. These narcotics were to be sold at **[1] RUBEN REYES-ECHEVARRIA** various drug points.

4. On or about June 5, 1996, **[1] RUBEN REYES-ECHEVARRIA** and **[2] CARLOS RUBERT-COLLAZO** contracted **[3] JOSE A RIVERA-SEGARRA**, a.k.a "Hershey", Jose Medina-Cruz, aka Jose "El Mellao", deceased, and an un-indicted co-conspirator in order for them to shoot and kill Jose Alberto Martinez, aka "Bertin Martinez". The purpose was for **[1] RUBEN REYES-**

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ECHEVARRIA to remain as the sole owner of the drug trafficking business of Jose Alberto Martinez, aka "Bertín Martinez".

5. On or about June 11, 1996, **[3] JOSE A. RIVERA-SEGARRA, aka "Hershey"**, and Jose Medina-Cruz, aka "Jose El Mellao", deceased, while carrying firearms entered the residence of Jose Alberto Martinez-Torres, aka "Bertin Martinez, located in Santa Isabel, Puerto Rico, and shot him.

6. On or about June 11, 1996, **[3] JOSE A. RIVERA-SEGARRA aka "Hershey"**, and Jose Medina-Cruz, aka "Jose El Mellao", deceased were assisted by **[4] ROBERTO BAEZ-SEGARRA, aka "Blackie"** and an-un-indicted co-conspirator in order to allude authorities and conceal the clothing used during the execution of the contract.

7. On or about June 12, 1996, Jose Alberto Martinez-Torres, aka "Bertin Martinez, died as a consequence of the bullet wounds.

8. On or about June 1996, **[1] RUBEN REYES-ECHEVARRIA** and **[2] CARLOS RUBERT-COLLAZO** paid **[3] JOSE A. RIVERA-SEGARRA aka "Hershey"**, Jose Medina-Cruz, aka "Jose El Mellao", deceased, and an un-indicted co-conspirator approximately fifty thousand dollars (\$50,000), which were paid in cash and narcotics.

9. On or about June of 1996, the narcotics obtained from **[1] RUBEN REYES-ECHEVARRIA** and **[2] CARLOS RUBERT-COLLAZO**, were distributed by **[3] JOSE A. RIVERA-SEGARRA aka "Hershey"**, Jose Medina-Cruz, aka "Jose El Mellao", deceased, and others at a drug point located at the Rosales Housing Project in Ponce, Puerto Rico.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about June 11, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

**[3] JOSE A. RIVERA-SEGARRA,
a.k.a. "Hershey"**

defendant herein, aided and abetted by Jose Medina-Cruz, aka "Jose El Mellao", deceased, used and carried two firearms (.9mm pistols) during the commission of a crime of violence to wit; the murder of Jose Alberto Martinez-Torres, aka "Bertin Martinez". All in violation of Title 21, United States Code, Section 924 (c)(1) and Title 18, United States Code, Section 2.

GUILLERMO GIL
United States Attorney

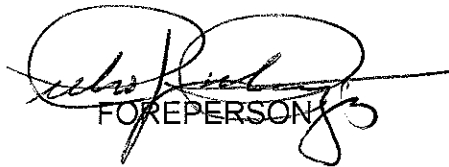


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TRUE BILL


FOREPERSON

Dated: March 18, 1999